



ASSOCIATION OF AMERICAN RAILROADS

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

May 7, 2018

Re: Notice of Ex Parte, GN Docket No. 17-183

Dear Ms. Dortch:

The Association of American Railroads (“AAR”) writes to express its continued concern with the potential for new licensed mobile or unlicensed use of the 5.925-6.426 and 6.425-7.125 GHz band (“6 GHz band”). As explained more fully in the AAR’s reply comments filed in the above captioned docket on November 15, 2017, the AAR’s member railroads are among the utilities, public safety organizations, and other critical infrastructure industries that rely on the 6 GHz band for vital communications systems. Railroads rely on private fixed microwave systems that operate in the 6 GHz band to ensure that safe operation of trains across the United States and the AAR reply comments explained that interference could disrupt, delay, or otherwise impact the safe operations of railroads. Subsequent ex parte filings submitted since those reply comments were filed have only heightened the AAR’s concerns.

Of significant concern to the AAR is a study by RFK Engineering Services submitted on behalf of a coalition of companies that purports to show that unlicensed use of the 6 GHz band would not cause harmful interference to incumbents in the band.¹ In contrast, the AAR believes that a subsequent analysis provided by the Fixed Wireless Communications Coalition, of which the AAR is a member, is on much sounder technical ground.² The AAR shares the concern articulated in the FWCC analysis that show that the uncontrolled distribution of unlicensed devices in the scope that RFK studied will cause harmful interference to fixed microwave receivers, including those used by AAR member railroads.

¹ Ex Parte Letter of Apple, Inc., Broadcom Corporation, Facebook, Inc., Hewlett Packard Enterprise, and Microsoft Corporation, GN Docket No. 17-183 (filed Jan. 26, 2018).

² Ex Parte Letter of Fixed Wireless Communication Coalition, Inc. (filed Mar. 13, 2018).

Railroads have depended on inference-free communications systems that utilize the 6GHz band to serve as the backbone for their communications networks for several decades. The system has supported control of the railroads wayside track switches and signals, as well as providing an ongoing view of train location. More recently, positive train control information, highway crossing monitoring, and other monitoring applications have been added to the network. These critical systems allow railroads to provide safe and efficient transportation service critical to the nation's economy.

Microwave technology is remarkably stable and has operated reliably over the years. Interference to the system would directly, and immediately, impact train movement, slowing and stopping trains. The stopped trains that would result from interference would impact railroad customers, impose costs on railroads, clog the interstate freight system and inconvenience local communities where trains would block at-grade crossings.

The AAR looks forward to continued productive dialogue with the Commission to ensure that incumbents in the 6 GHz band can continue to operate their communications systems free from interference.

Respectfully submitted,



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Counsel for the Association
of American Railroads